UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

INFORMATION

v.

25 Cr. 184

FRANK ALICEA, a/k/a "Frank White,"

Defendant.

COUNT ONE(Distribution of Narcotics)

The Acting United States Attorney charges:

- 1. On or about May 17, 2022, in the Southern District of New York, FRANK ALICEA, a/k/a "Frank White," the defendant, knowingly and intentionally distributed and possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).
- 2. The controlled substance involved in the offense was a quantity of mixtures and substances containing a detectable amount of cocaine base, in a form commonly referred to as "crack," in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(C).)

<u>COUNT TWO</u> (Firearms Use, Carrying, and Possession)

The Acting United States Attorney further charges:

3. On or about May 17, 2022, in the Southern District of New York, FRANK ALICEA, a/k/a "Frank White," the defendant, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the drug trafficking crime

charged in Count One of this Information, knowingly used and carried a firearm, and in furtherance of such crime, possessed a firearm.

(Title 18, United States Code, Section 924(c)(1)(A)(i).)

FORFEITURE ALLEGATIONS

- 4. As a result of committing the offense alleged in Count One of this Information, FRANK ALICEA, a/k/a "Frank White," the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.
- 5. As a result of committing the offense alleged in Count Two of this Information, FRANK ALICEA, a/k/a "Frank White," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28 United States Code, Section 2461(c), any and all firearms and ammunition involved in or used in said offenses, including but not limited to: (i) one .22-caliber Heritage revolver, and (ii) 100 .22-caliber cartridges.

Substitute Assets Provision

- 6. If any of the above-described forfeitable property, as a result of any act or omission of FRANK ALICEA, a/k/a "Frank White," the defendant:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third person;
 - c. has been placed beyond the jurisdiction of the Court;

- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 924(d)(1); Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461(c).)

MATTHEW PODOLSKY
Acting United States Attorney